

OM 16-019

Effective Date: 24 Mar 2016

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By Order of the Acting Assistant Director  
Stewart D. Smith, DHSc/s/

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TO: IHSC Public Health Service (PHS) Commissioned Corps Officers, Civilian Federal Employees and Contract Personnel

SUBJECT: Mental Health Case Management (Medical Case Management Unit)

1. **PURPOSE:** The purpose of this Operations Memorandum (OM) is to set forth the guidance for the Medical Case Management Unit (MCMU) relating to mental health case management.
2. **APPLICABILITY:** This OM applies to all Immigration and Customs Enforcement (ICE) Health Service Corps (IHSC) federal and non-federal staff working on IHSC Medical Case Management activities.
3. **AUTHORITIES AND REFERENCES:**
  - 3-1. Title 8, Code of Federal Regulations, section 235.3 (8 CFR 235.3), Inadmissible Aliens and Expedited Removal;
  - 3-2. Section 232 of the Immigration and Nationality Act (8 USC 1222), Detention of aliens for physical and mental examination;
  - 3-3. Title 8, Code of Federal Regulations, section 232 (8 CFR 232), Detention of Aliens for Physical and Mental Examination;
  - 3-4. Section 322 of the Public Health Service Act (42 USC 249(a)), Medical Care and Treatment of Quarantined and Detained Persons;
  - 3-5. Title 42, U.S. Code, Public Health Service Act, Section 252 (42 USC 252); Medical Examination of Aliens.
4. **GUIDANCE:** The IHSC MCMU provides mental health case management services to ICE detainees in conjunction with the IHSC Behavioral Health Unit (BHU).

#### **4-1. Segregation Reporting**

- a. MCMU staff members provide written updates on ICE detainees housed in segregation units at detention facilities where IHSC does not provide direct patient care services.
  - (1) Mental Health Cases: IHSC BHU requests an initial report and subsequent weekly updated reports for detainees with possible or identified mental health problems from the responsible FMC based on the current ICE segregation policy. BHU staff members maintain the spreadsheets and complete the comments in the ICE Segregation Management Review System (SRMS) for these cases.
  - (2) Medical Cases: The designated Managed Care Coordinator (MCC) requests an initial and subsequent weekly updated reports for detainees housed in segregation with diagnosed or suspected serious medical conditions from the responsible FMC, based on the current ICE segregation policy. The designated MCC will enter the appropriate comments in the SRMS.
- b. As directed, the designated MCC attends weekly meetings with representatives from IHSC HQ, ICE Enforcement and Removal Operations (ERO) HQ, Office of Principal Legal Advisor (OPLA), and Office of Detention Policy and Planning (ODPP) to discuss the status of all ICE detainees in segregation with serious medical or mental health conditions and whether alternative housing is needed and/or available. A MCC and a member of the IHSC Health Operations Unit provide the verbal updates on the ICE detainees in segregation with medical conditions. BHU staff members provide updates on the ICE detainees in segregation with mental health conditions.

#### **4-2. Krome Transitional Unit (KTU)**

- a. The IHSC Krome Transitional Unit (males only), is a specialized inpatient mental health unit that is designated for the delivery of psychotherapy, psychopharmacology, close observation, and evaluation of patients. The IHSC Krome Transitional Unit includes detainees that have been diagnosed with a mental illness, who are not acute enough for an inpatient psychiatric hospital admission, but are not mentally stable for general population.
- b. FMCs assist with the identification of candidates for the KTU and provide pertinent information to IHSC BHU and ERO regarding the detainee.

#### **4-3. Columbia Regional Care Center (RCCC)**

- a. Columbia Regional Care Center (CRCC) is an in-patient detention health care facility in Columbia, South Carolina run by GEO Care, LLC offering a wide range of health care services to a detained population. IHSC currently utilizes CRCC for the housing and treatment of detainees with chronic mental health conditions. FMCs assist with the identification of appropriate candidates for possible admission to CRCC and provide pertinent information to IHSC BHU and ERO regarding the detainees.

#### **4-4. Suicide Observation, Attempts and Completions**

- a. FMCs, in cooperation with non-IHSC staffed detention facilities, monitor detainees who are on suicide observation or had a recent suicide attempt and evaluate the facility's compliance with ICE Detention Standards.
- b. FMCs provide written updates regarding these detainees to IHSC HQ.
- c. Completed suicides: The FMC provides requested information to IHSC HQ for the mortality review by the Medical Quality Management Unit (MQMU).

#### **4-5. Hunger Strikes**

- a. FMCs are responsible for working with local jails and detention facilities regarding detainees who are on a hunger strike to monitor the detainee's medical status and the facilities' compliance with ICE Detention Standards.
- b. For those detainees who can no longer remain at the current detention facility due to the need for a higher level of care, the FMC assists with the coordination of a transfer to either another facility or to the community hospital, as needed.
- c. The FMC provides updates to IHSC HQ, ICE HQ and local ERO leadership.

#### **4-6. IHSC 007/883 – Mental Health Competency/Office of Principal Legal Advisor (OPLA)**

- a. OPLA staff members use the IHSC 007: *OPLA Request for Medical Records* to request an IHSC 883: *Mental Health Review* or medical records for detainees with possible mental health competency issues.



- b. OPLA staff members route the IHSC 007 to BHU HQ staff and copy the local FMC for awareness.
  - c. IHSC BHU staff members address the completion of the IHSC 007, completion of the IHSC 883 or obtain the medical record and provide the requested documents to the requestor in OPLA. BHU staff notifies the FMC via e-mail when the request has been addressed.
  - d. Requests for mental health competency exams for competency hearings are forwarded to ICE OPLA HQ personnel.
- 5. **PROCEDURES:** The procedures related to this directive are found in the Medical Case Management Unit Program Guide, Section 8: *Mental Health Case Management*
- 6. **HISTORICAL NOTES:** This directive is new and does not replace a previous directive.
- 7. **DEFINITIONS:**

**Behavioral Health Unit** – The Behavioral Health Unit is a unit under the Deputy Assistant Director of Clinical Service within IHSC. The Unit provides behavioral health services with a focus on meeting the best practice mental health standards to detainees in IHSC custody. The Behavioral Health Unit provides consultation on behavioral health issues, coordinates Post Order Custody Review (POCR) evaluations and any other services requested by ICE. (IHSC Operational Definition)

**Field Medical Coordinator (FMC)** – FMCs operate within the Medical Case Management Unit and are co-located with the Field Office Directors (FODs). The FMC identifies and monitors detainees with significant medical conditions, performs case monitoring on detainees who are hospitalized, and assists with alternate placement of detainees in IGSA facilities. He or she gathers information and documents for medical reviews and collaborates with appropriate health officials to ensure continuity of care upon removal for those detainees with significant health conditions. (IHSC Operational Definition)

**Medical Quality Management Unit (MQMU)** – MQMU is an IHSC unit under the Deputy Assistant Director of Administration that develops and maintains policies and procedures for IHSC; interacts and coordinates with all IHSC-staffed medical facilities to ensure adherence to the accrediting body standards set forth by the accrediting bodies. In addition, MQMU oversees the IHSC Quality Improvement Program, the Risk Management Program, Compliance Investigations, and the IHSC Patient Education Program. (IHSC Operational Definition)

**8. APPLICABLE STANDARDS:**

**8-1. Performance Based National Detention Standards (PBNDs):**

- a. *Hunger Strikes*
- b. *Medical Care, Sub-section N. Mental Health Program*
- c. *Significant Self-harm and Suicide Prevention and Intervention*

**8-2. American Correctional Association (ACA):**

- a. Performance-Based Standards for Adult Local Detention Facilities, 4<sup>th</sup> edition
  - (1) 4-ALDF-1C-05, *Emergencies*
  - (2) 4-ALDF-4C-27, *Mental Health Program*
  - (3) 4-ALDF-4C-32, *Suicide Prevention*
- b. Standards for Adult Correctional Institutions, 4<sup>th</sup> edition
  - (1) 4-4224, *Threats to Security*
  - (2) 4-4368, *Mental Health Program*
  - (3) 4-4373, *Suicide Prevention and Intervention*

**8-3. National Commission on Correctional Health Care (NCCHC):**

- a. Standards for Health Services in Jails, 2014
  - (1) J-E-05, *Mental Health Screening and Evaluation*
  - (2) J-G-04, *Basic Mental Health Services*
  - (3) J-G-05, *Suicide Prevention Program*
  - (4) J-I-03, *Forensic Information*